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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

8 CHARLENE BYNUM individually, as the
9 wife of RONALD BYNUM and as the
Guardian of the Person and Estate of
RONALD BYNUM,

10 Plaintiff,

11 vs.

12 CITY OF NORTH LAS VEGAS; JACOB
RAY (P#1886); RODRIGO DELARA
(P#2417); JOHN E TONRY (P#1684); et al

13
14 Defendants.
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16 Case No: 2:17-CV-02102-APG-VCF

17 Consolidated With
Case No. 2:18-CV-00354-MMD-CWF

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**STIPULATION AND ORDER
TO
EXTEND TIME FOR RESPONSE
TO
DISPOSITIVE MOTIONS**

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FIRST REQUEST

22 Pursuant to LR 6-1 and 26-4, the parties, by and through their respective counsel of record
hereby stipulate and request this court extend the deadline to file responses to DEFENDANTS'
Motions for Summary Judgment by 30 days to and including the 30th of October, 2019.

23 DEFENDANTS NLV AND CCS have, on behalf of themselves and their respective
24 employees, each filed Motions for Summary Judgment in this matter. The Las Vegas defendants
have joined in both motions. Collectively, the Motions total 67 pages, exclusive of exhibits. The
appended exhibits collectively total more than 140 pages. There are more than 60 defendants;
more than 30 depositions and thousands of pages of record. There are approximately 72 hours of
video.

25 Both DEFENDANTS NLV AND CCS requested and, with stipulation, were granted more
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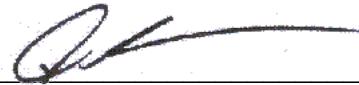
1 than 30 days past the dispositive motion deadline to file their Motions.

2 In addition, Plaintiff's main paralegal assigned to this case has been hospitalized or absent
3 from work due to illness for much of the time allotted for the response.

4	Dated this 24 th day of SEPTEMBER, 2019.	Dated the 24 th day of September, 2019
5	LAW OFFICE OF DAN M. WINDER, P.C. <u>/s/Dan M. Winder</u> DAN M. WINDER, ESQ. Nevada State Bar No. 1569 3507 W. Charleston Blvd. Las Vegas, NV 89102 Telephone: (702) 474-0523 Facsimile: (702) 474-0631 winderdanatty@aol.com <i>Attorneys for Plaintiff</i>	<u>/s/Robert W. Freeman,Jr</u> Robert W. Freeman, Jr., Esq. Nevada Bar No. 3062 6385 S. Rainbow Blvd., Suite 600 Las Vegas, Nevada 89118 Attorneys for Defendants NLV and its employees
13	Dated this 24 th day of September, 2019.	Dated this 24 th day of September, 2019
14	<u>/s/Brent Vogel</u> S. Brent Vogel, Esq. John M. Orr, Esq. LEWIS BRISBOIS BISGAARD & SMITH LLP 6385 South Rainbow Boulevard, #600 Las Vegas, NV 89118 Attorneys for Defendants CORRECT CARE SOLUTIONS & ITS EMPLOYEES	<u>/s/John A.Curtas</u> John A. Curtas Deputy City Attorney NV Bar No. 1841 495 South Main Street, sixth Floor Las Vegas, NV 89101 Attorneys for City of Las Vegas Defendants

21 **ORDER**

22 IT IS SO ORDERED.

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25 UNITED STATES DISTRICT JUDGE
26 Dated: September 25, 2019.
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